



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
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January 13, 2020

VIA ECF

The Honorable P. Kevin Castel
 United States District Judge
 United States Courthouse
 500 Pearl Street, Courtroom 11D
 New York, NY 10007-1312

Re: SEC v. Rashid, No. 17-cv-8223-PKC (S.D.N.Y.)

Dear Judge Castel:

During the trial of this matter on January 7, 2020, Your Honor asked the SEC whether all the expenses that appear on PX 111 (BDO spreadsheet) for the time period January 2, 2011 through March 2013 are included in the 52 pages of attachment to PX 96 (Michel spreadsheet). (Tr. at 1085) Based on our review of PX 111 there are 131 entries on that exhibit that are not included in PX 96 for the time period January 3, 2011 through March 18, 2013. Each of these 131 entries on PX 111 have a notation that states "Not on Ali's Sch" in the first column. Below is an example for Item 1129 on PX 111 with such a notation:

Not on Ali's Sch	1129	5/30/2011	OCEAN HOUSE LLC	20064	Meals - Clients	N	AMX	Ascometal SA	USD	112.35
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Your Honor also asked which of the BDO line items covered by the SEC on examination of Mr. Rashid are included in PX 96. (Tr. at 1085). The following BDO line items covered by the SEC on examination of Mr. Rashid are included in PX 96:

The Honorable P. Kevin Castel

January 13, 2020

Page 2

BDO 786	BDO 1443	BDO 1705
BDO 790	BDO 1454	BDO 1752
BDO 791	BDO 1455	BDO 1777
BDO 792	BDO 1456	BDO 1788
BDO 793	BDO 1457	BDO 1852
BDO 957	BDO 1458	BDO 2097
BDO 958	BDO 1459	BDO 2246
BDO 971	BDO 1460	BDO 2323
BDO 972	BDO 1461	BDO 2325
BDO 1241	BDO 1462	BDO 2327
BDO 1244	BDO 1463	BDO 2335
BDO 1253	BDO 1464	BDO 2537
BDO 1270	BDO 1466	BDO 2346
BDO 1292	BDO 1563	BDO 2399
BDO 1442	BDO 1704	

Your Honor also asked the SEC which of these items Mr. Rashid indicated he would take as personal. Tr. at 1086. For BDO line items 790-793, 1463, 1464, 1788, 2325, and 2399, Mr. Rashid made an indication on PX 96 that he would take them as “personal.” For the rest of the items listed above, Mr. Rashid either added comments in an attempt to justify the expense or did not provide any further explanation for the expense.

Finally, the SEC’s examination of Mr. Rashid included the following BDO line items that are not found on PX 96: BDO 1103; BDO 1129; BDO 1138; and BDO 1169, each of which contain the annotation “Not on Ali’s Sch.”

The Honorable P. Kevin Castel
January 13, 2020
Page 3

Please let us know if Your Honor would like us to provide additional information or have further questions about this issue.

Respectfully submitted,

s/Duane K Thompson

Duane K. Thompson

cc: Counsel of Record (via ECF)